

1 **Sarah J. Ryan**
2 **OSB No. 83131**
3 sryan@bjllp.com
4 Ball Janik LLP
5 One Main Place
6 101 Southwest Main Street, Suite 1100
7 Portland, Oregon 97204-3219
8 Telephone: 503-228-2525
9 Attorneys for Defendants

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF OREGON**

12 DOUGLAS G. MAIER,)	
)	Case No. 98-1095-ST
13 Plaintiff,)	
)	
14 v.)	AFFIDAVIT OF MARK ROCKWELL
)	In Support of Defendants' Reply
15 PACIFIC HERITAGE HOMES, INC., an)	Memorandum in Support of Defendants'
16 Oregon corporation, PACIFIC SANTA FE)	Motion for Summary Judgment and
17 CORPORATION dba PACIFIC LAND)	Memorandum in Opposition to Plaintiff's
18 MANAGEMENT, INC., and MARK)	Motions to Strike
19 ROCKWELL,)	
)	
20 Defendants.)	
)	

21 I, MARK ROCKWELL, being duly sworn, deposes and states as follows:

22 1. I am named as an individual defendant in this matter and am President of defendants
23 Pacific Heritage Homes, Inc. and Pacific Santa Fe Corporation. I make this affidavit of my own
24 personal knowledge, and if called as a witness, am competent to testify hereto.

25 2. The document attached as Exhibit 3 to the Affidavit of Sarah J. Ryan in Support of
26 Motion for Summary Judgment is a true and correct copy of the signed offer of employment letter,

1 from me to Mr. Maier, dated June 3, 1996. I prepared that letter, and sent a copy to Mr. Maier.
2 Mr. Maier returned that letter, signed, to me.

3 3. The document attached as Exhibit 4 to Ms. Ryan's affidavit is a memorandum to me
4 from Mr. Maier, dated September 26, 1997. I received that memorandum on or about September
5 26, 1997 from Mr. Maier.

6 DATED this _____ day of September, 1999.

7
8
9 _____
10 MARK ROCKWELL

11 The foregoing instrument was acknowledged before me on this _____ day of September,
12 1999.

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14 _____
15 NOTARY PUBLIC FOR OREGON
16 My Commission Expires: _____
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